

UNITED STATES DISTRICT COURT  
DISTRICT OF NEBRASKA

LUIS EDUARDO SAN JUAN,

Plaintiff,

VS.

FIRST NATIONAL BANK OF OMAHA,

Defendant.

Case. No. 8:10-CV-00133

**MOTION FOR LEAVE TO**  
**FILE AMENDED COMPLAINT**

COMES NOW Plaintiff, Luis Eduardo San Juan, pursuant to Fed. R. Civ. P. 15, and moves this Court for leave to file the Amended Complaint attached hereto as Exhibit “A”. In support, Plaintiff shows to the Court as follows:

1. This is Plaintiff's first request for leave to amend the Complaint.
2. Plaintiff is seeking leave to include an additional cause of action.
3. Defendant will not be prejudiced by Plaintiff's filing of the Amended Complaint.

WHEREFORE, Plaintiff Luis Eduardo San Juan requests that the Court grant him leave to file the Amended Complaint attached hereto as Exhibit "A".

LUIS EDUARDO SAN JUAN, Plaintiff

By: s/Patrick M. Flood

Patrick M. Flood, #19042  
HOTZ, WEAVER, FLOOD, BREITKREUTZ  
& GRANT  
444 Regency Parkway Drive, Suite 310  
Omaha, NE 68114  
(402) 397-1140  
(402) 397-1199 (facsimile)

CERTIFICATE OF SERVICE

I hereby certify that on August 31, 2010, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system, which will send notification of such filing to the following:

Roderick V. Hannah  
HANNAH & JANKOWSKI  
2 South University Drive, Suite 265  
Plantation, FL 33324

Patrick J. Barrett  
FRASER STRYKER PL LLO  
500 Energy Plaza  
409 South 17th Street  
Omaha, NE 68102

s/Patrick M. Flood